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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATE OF AMERICA,)	No.
)	
Plaintiff,)	VIOLATIONS: 18 U.S.C. § 371 -
)	Conspiracy to Violate the
v.)	Neutrality Act, 18 U.S.C. § 960;
)	18 U.S.C. § 956(a)- Conspiracy
HARRISON ULRICH JACK;)	to Kill, Kidnap, and Maim;
GENERAL VANG PAO,)	18 U.S.C. §§ 371, 2332g -
aka Pao Vang,)	Conspiracy to Receive and
aka Vang Pao;)	possess Missile Systems Designed
LO CHA THAO;)	to Destroy Aircraft; 18 U.S.C.
LO THAO,)	§ 371 - Conspiracy to Receive
aka President Lo Thao,)	and Possess Firearms and
aka Xai Lo Thao;)	Destructive Devices, 18 U.S.C.
YOUA TRUE VANG,)	§ 922(o), 26 U.S.C. § 5861;
aka Joseph Youa Vang,)	18 U.S.C. § 371, 22 U.S.C.
aka Colonel Youa True Vang;)	§ 2778 - Conspiracy to Export
HUE VANG;)	Listed Munitions Without a State
CHONG YANG THAO;)	Department License
SENG VUE;)	
CHUE LO;)	
NHIA KAO VANG; and)	
DANG VANG,)	
aka David Vang,)	
)	
Defendants.)	

I N D I C T M E N T

COUNT ONE: [18 U.S.C. § 371 - Conspiracy to Violate the
Neutrality Act, 18 U.S.C. § 960]

the Grand Jury charges:

HARRISON ULRICH JACK;
GENERAL VANG PAO,
aka Pao Vang,
aka Vang Pao;
LO CHA THAO;
LO THAO,
aka President Lo Thao,
aka Xai Lo Thao;
YOUA TRUE VANG,
aka Joseph Youa Vang,
aka Colonel Youa True Vang;
HUE VANG;
CHONG YANG THAO;
SENG VUE;
CHUE LO;
NHIA KAO VANG; and
DANG VANG,
aka David Vang

defendants herein, as follows:

I. PARTIES, PERSONS AND ENTITIES

1. Defendant HARRISON ULRICH JACK was a resident of Woodland, Yolo County, in the Eastern District of California. Defendant JACK operated a consulting business located at 101 Monte Vista Drive, Woodland, California.

Defendant JACK is a graduate of the United States Military Academy at West Point, Class of 1968, and was commissioned upon graduation into the Infantry branch of the Army. He is a graduate of the Infantry Officer's Basic Course, Airborne School and Ranger School, as well as other Army professional training courses. He served at least one tour as an Army officer in Southeast Asia before being released from active duty in the Army in 1977. He is a retired military officer of the United States, having retired from the California National Guard with the rank of lieutenant colonel.

2. Defendant VANG PAO is a former general in the Royal Army of Laos, and came to the United States in or about 1975.

1 Defendant VANG Pao is the head of an organization known as the
2 Neo Hom, and has lobbied on behalf of Hmong causes in the United
3 States and in Laos. At all relevant times, defendant VANG Pao
4 was a resident of Westminster, in Orange County, California.

5 3. Defendant LO CHA THAO was a resident of Clovis, in
6 Fresno County, California.

7 4. Defendant LO THAO, aka President Lo Thao, aka Xai Lo
8 Thao, has been a resident of Sacramento County, California.

9 Defendant LO THAO is the president of United Hmong International
10 ("UHI"), which is also known as the Supreme Council of the Hmong
11 18 Clans. Defendant THAO is the Thao clan representative on UHI.

12 5. Defendant YOUA TRUE VANG, aka Joseph Youa Vang, aka
13 Colonel Youa True Vang, was a resident of Fresno, California, and
14 is a founder of Hmong International New Year in Fresno.

15 6. Defendant HUE VANG was a resident of Clovis, California.
16 He is a former Clovis police officer. Defendant VANG is the
17 Director of United Lao Council for Peace, Freedom and
18 Reconstruction.

19 7. Defendant CHONG YANG THAO was a resident of Fresno,
20 California and is associated with a chiropractic clinic.

21 8. Defendants SENG VUE, who was a resident of Fresno, and
22 CHUE LO, who was a resident of Stockton, are clan representatives
23 in United Hmong International. Defendant NHIA KAO VANG was a
24 resident of Rancho Cordova, California.

25 II. PRELIMINARY ALLEGATIONS

26 9. Laos, also known as the Lao People's Democratic Republic
27 ("Laos") is a sovereign nation with which the United States has
28 been at peace at all times relevant to this indictment. The

1 capital city of Laos is Vientiane.

2 10. A machine gun is one that will fire more than one
3 round, or bullet, without manual reloading, with a single
4 function of the trigger. It is a violation of federal law in the
5 United States to possess, transfer, or receive automatic weapons
6 unless authorized by law, such as members of the military who are
7 assigned these weapons as part of their military mission, or
8 unless registered with the National Firearms Registry maintained
9 by the Bureau of Alcohol, Tobacco, Firearms, and Explosives.

10 11. An AK-47 is a machine gun that is manufactured in
11 former Soviet Bloc countries, including Russia, other former
12 Soviet Republics, and Poland. It is an automatic weapon within
13 the meaning of Title 18, United States Code, Section 922(o) and
14 Title 26, United States Code, Sections 5845(b) and 5861.

15 12. An M-16 is a machine gun that is manufactured in the
16 United States for use by United States military departments.
17 It is an automatic weapon within the meaning of Title 18, United
18 States Code, Section 922(o) and Title 26, United States Code,
19 Sections 5845(b) and 5861.

20 13. Grenades, rocket-propelled grenades, Claymore mines,
21 C-4 explosives, LAW rockets, and AT-4 anti-tank rockets all are
22 explosive devices within the meaning of Title 18 and Title 26 of
23 the United States Code. It is a violation of federal law in the
24 United States to possess, transfer, or receive these destructive
25 devices unless authorized by law, such as members of the military
26 who are assigned these weapons as part of their military mission,
27 or unless registered with the National Firearms Registry
28 maintained by the Bureau of Alcohol, Tobacco, Firearms, and

1 Explosives.

2 14. Stinger missiles are surface-to-air missiles that are
3 designed to destroy aircraft.

4 III. THE CONSPIRACY

5 15. Beginning on a date unknown, but no later than in or
6 about November of 2006, and continuing until on or about June 3,
7 2007, in the Eastern District of California and elsewhere,
8 defendants did conspire, combine, confederate, and agree with
9 each other and with others both known and unknown to the grand
10 jury, to violate the Neutrality Act, in violation of Title 18,
11 United States Code, Section 960, by providing and preparing a
12 means for and furnishing the money for and taking part in a
13 military expedition or enterprise to be carried on against the
14 territory and dominion of the foreign and sovereign nation of
15 Laos, with which the United States is at peace.

16 16. The object of the conspiracy was to engage in the
17 violent overthrow of the sovereign government of the nation of
18 Laos, by engaging in an armed insurgency operation in Laos in
19 violation of Title 18, United States Code, Section 960.

20 MANNER AND MEANS BY WHICH THE
21 CONSPIRACY WAS CARRIED OUT

22 The manner and means by which the conspiracy was sought to
23 be accomplished included, among others, the following:

24 17. Defendants General VANG Pao, Lo Cha THAO, Lo THAO, Youa
25 True VANG, Hue VANG, Seng VUE, Chue LO and others formed a
26 committee to evaluate the feasibility of conducting a military
27 expedition or enterprise to engage in the overthrow of the
28 existing government of Laos by violent means, including murder,

1 assaults on both military and civilian officials of Laos, and
2 destruction of buildings and property of Laos.

3 18. Defendants Harrison JACK, General VANG Pao, Lo Cha
4 THAO, Lo THAO, Youa True VANG, Hue VANG, Seng VUE, Chue LO and
5 others utilized the well established Hmong tribal clan structure
6 as part of the conspiracy. The defendants operated within the
7 general scope of a Lao liberation movement known as Neo Hom, also
8 known as the United Lao National Liberation Front. The
9 acknowledged leader of the Neo Hom movement in the United States
10 is defendant General VANG Pao.

11 19. Defendants General VANG Pao, Lo Cha THAO, Lo THAO, Youa
12 True VANG, Hue VANG, Seng VUE, Chue LO and others, operating
13 through or in conjunction with the Neo Hom movement, assigned
14 rank and responsibilities to members of the committee and the Neo
15 Hom movement.

16 20. Defendants General VANG Pao, Lo Cha THAO, Lo THAO, Youa
17 True VANG, Hue VANG, Seng VUE, Chue LO and others engaged in
18 extensive fund-raising activities for the purpose of acquiring
19 substantial financial assets that could be used to purchase
20 military arms, materiel, and munitions, such as AK-47 and M-16
21 automatic rifles, Stinger missiles, LAW rockets, AT-4 anti-tank
22 rockets, Claymore mines, C-4 explosive, night vision goggles,
23 magazines, ammunition for all the weapons, medical kits, rain
24 gear, and related military equipment.

25 21. According to defendant Lo Cha THAO, the defendants
26 recruited intelligence assets to conduct surveillance and
27 reconnaissance operations throughout Laos, including the national
28 capital area in Vientiane, Laos.

1 22. According to the defendants, they recruited and
2 organized a military force of insurgent troops within Laos, which
3 were organized into military departments based upon provincial
4 boundaries.

5 23. Defendants General VANG Pao, Lo Cha THAO, Lo THAO, Youa
6 True VANG, Hue VANG, Seng VUE, Chue LO and others engaged in
7 procurement operations to acquire military arms, equipment,
8 materiel, and munitions for use in military operations in Laos.
9 As part of the procurement process, the defendants recruited and
10 utilized defendant Harrison JACK, a former career United States
11 Army infantry officer who has contacts in the American military,
12 homeland security, and defense contractor community.

13 24. As part of the attempt to acquire military arms and
14 munitions, defendant Harrison JACK contacted at least one member
15 of the defense contractor community from whom defendant JACK
16 believed the defendants could purchase firearms, destructive
17 devices, and other military arms and munitions.

18 25. As part of the attempt to engage in the violent
19 overthrow of the government of Laos, defendants Harrison JACK,
20 General VANG Pao, Lo Cha THAO, Lo THAO, Youa True VANG, Hue VANG,
21 Seng VUE, Chue LO created an operational plan for armed
22 insurgency operations in Laos.

23 26. Between January and June of 2007, the defendants
24 collectively and individually inspected samples of military arms
25 and munitions for purchase and delivery to Thailand and Laos,
26 including: AK-47 machine guns; M-16A1 and M-16A2 machine guns,
27 including some with grenade launchers; RPG-7 rocket-propelled
28 grenade launchers; LAW rockets; AT-4 anti-tank rockets; Claymore

1 mines; C-4 explosives; a Stinger missile; and ammunition for
2 AK-47 machine guns.

3 27. As part of the insurgency operation, the defendants
4 attempted to secure the temporary services of a number of
5 mercenary operatives with training and experience as special
6 operations troops, such as former U.S. Army Special Forces
7 soldiers or U.S. Navy SEALs, who have left military service and
8 are now private citizens.

9 28. As part of the insurgency operation, the defendants
10 issued an operations plan to the undercover agent to conduct a
11 military strike in downtown Vientiane, Laos against specifically
12 identified military and civilian government personnel and
13 buildings. The defendants issued instructions that the mercenary
14 force was to destroy these government facilities.

15 29. As part of the insurgency operation, defendants
16 Harrison JACK, General VANG PAO, Lo Cha THAO, Lo THAO, Youa True
17 VANG, Chue LO, Seng VUE and Hue VANG provided an ATF undercover
18 agent with maps of Laos showing the emplacements of both
19 insurgent and Lao government troops, as well as staging areas and
20 landing zones into which personnel and equipment could be
21 inserted for combat operations. Defendants Harrison JACK,
22 General VANG PAO, Lo Cha THAO, Lo THAO, Youa True VANG, Chue LO,
23 Seng VUE and Hue VANG identified on maps and photographs certain
24 government buildings and facilities that they wanted destroyed in
25 the opening hours of insurgent military operations against the
26 government of Laos.

27 30. As part of the insurgency operation, defendants
28 Harrison JACK, General VANG PAO, Lo Cha THAO, Lo THAO, Youa True

1 VANG, Chue LO, Seng VUE, CHONG YANG THAO, NHIA KAO VANG and Hue
2 VANG negotiated the purchase of thousands of items of military
3 arms, ammunition, and munitions. Pursuant to these negotiations,
4 an initial installment of 125 AK-47 machine guns, 20,000 rounds
5 of ammunition, and crates of smoke grenades was to be delivered
6 to a safe house in Thailand on June 12, 2007. Defendants JACK,
7 Lo Cha THAO, Lo THAO, and Chong Yang THAO identified a safe house
8 in Thailand near the Laos border where the undercover agent
9 should make the delivery.

10 31. As part of the insurgency operation, defendants JACK,
11 Lo Cha THAO, Lo THAO, and Chong Yang THAO made arrangements for a
12 second installment of military arms to be delivered to a remote
13 location in Thailand on June 19, 2007. The second delivery of
14 military arms included a number of Stinger missiles, the purpose
15 of which is to destroy aircraft in flight.

16 32. As part of the insurgency operation, defendant Lo Cha
17 THAO and other defendants made arrangements to personally deliver
18 \$50,000 in United States currency to the undercover agent in
19 Bangkok, Thailand on June 11, 2007.

20 OVERT ACTS

21 33. In furtherance of that agreement and to effect the
22 objects thereof, one or more of the defendants or their
23 co-conspirators performed the following overt acts in the Eastern
24 District of California and elsewhere:

25 A. In or about November 2006, in the Eastern District
26 of California, defendant Harrison JACK engaged in a telephone
27 conversation with a third party regarding the purchase of 500
28 AK-47 machine guns.

1 B. On or about January 23, 2007, in the Eastern
2 District of California, defendant Harrison JACK engaged in a
3 telephone conversation with an undercover agent from the United
4 States Bureau of Alcohol, Tobacco, Firearms, and Explosives
5 ("ATF") regarding the purchase of 500 AK-47 automatic rifles.

6 C. On or about January 25, 2007, in the Eastern
7 District of California, defendant Harrison JACK met with an ATF
8 undercover agent and engaged in a conversation regarding the
9 purchase of 500 automatic rifles (either AK-47 or M-16), 3,000
10 magazines, and more than 90,000 rounds of ammunition, along with
11 the services of an unspecified number of mercenary special
12 operations troops.

13 D. On or about February 1, 2007, in the Eastern
14 District of California, defendant Harrison JACK engaged in a
15 telephone call with the ATF undercover agent.

16 E. On or about February 5, 2007, in the Eastern
17 District of California, defendant Harrison JACK left a telephone
18 message with the undercover agent in which defendant JACK advised
19 the agent that Wednesday would be an ideal time to meet, and that
20 the highest leadership, including defendant General VANG PAO
21 would be present.

22 F. On or about February 5, 2007, in the Eastern
23 District of California, defendant Harrison JACK engaged in a
24 telephone conversation with the undercover ATF agent, at which
25 time defendant JACK advised the agent that he was on the other
26 line with defendant General VANG PAO as they spoke, and that
27 defendant JACK was going to bring four or five people to the
28 meeting on Wednesday.

1 The February 7, 2007 Meeting

2 G. On or about February 7, 2007, in the Eastern
3 District of California, defendant Harrison JACK, General VANG
4 PAO, Lo Cha THAO, Lo THAO, Youa True VANG, Seng VUE, Chu LO, Hue
5 VANG, and other associates engaged in a face-to-face meeting with
6 the undercover agent at a restaurant in Sacramento, California,
7 at which time the defendants engaged in a conversation with an
8 ATF undercover agent regarding the purchase of automatic weapons,
9 magazines, ammunition, explosives, LAW rockets, RPGs, Claymore
10 mines, and other arms and munitions.

11 I. On or about February 7, 2007, in the Eastern
12 District of California, defendant Harrison JACK, General VANG
13 PAO, Lo Cha THAO, Lo THAO, Youa True VANG, Seng VUE, Chu LO, Hue
14 VANG, and other associates provided an ATF undercover agent with
15 several maps of Laos, showing locations purported to be Lao
16 government military positions and insurgent forces positions.

17 J. On or about February 7, 2007, in the Eastern
18 District of California, defendants Harrison JACK, General VANG
19 PAO, Lo Cha THAO, Lo THAO, Youa True VANG, Seng VUE, Chu LO, Hue
20 VANG, and other associates personally inspected a sample of AK-47
21 and M-16 machine guns, C-4 explosives, LAW rockets, RPG
22 launchers, Claymore mines, and other arms and munitions.

23 Communications Following the February Meeting

24 K. On or about February 15, 2007, in the Eastern
25 District of California, defendant Harrison JACK contacted the ATF
26 undercover agent to advise that he had just finished a major
27 strategy meeting with approximately 22 senior leadership members.
28 Defendant JACK said that they were "in motion" and had budgeted

1 for virtually everything on the weapons inventory/price list that
2 the undercover agent had provided on February 7. The cost of the
3 entire list that had been provided was approximately \$9.8
4 million.

5 L. On or about March 5, 2007, in the Eastern District
6 of California, defendant Harrison JACK met with the undercover
7 agent for one hour and 45 minutes at a bar and grill in
8 Sacramento. Defendant JACK advised the undercover agent that
9 approximately three weeks earlier, he had organized and attended
10 a conference call for all the Hmong leadership in the United
11 States, and that he had been involved in several conversations
12 with defendant General VANG Pao in which defendant General VANG
13 Pao stated that they wanted to overthrow the government of Laos
14 immediately. JACK told the undercover agent that the Neo Hom
15 organization had people running operations on a regular basis,
16 and that defendant JACK had been shown an operations plan that
17 had impressed him.

18 M. On or about March 7, 2007, in the Eastern District
19 of California, defendant Harrison JACK had a discussion with the
20 undercover agent about Stinger missiles and their ability to take
21 down helicopters that were spraying "yellow rain" in Laos.
22 "Yellow rain" is a chemical agent that can kill or injure people
23 who come into contact with it. Defendant JACK asked how soon the
24 missiles could be in Laos.

25 N. On or about April 4, 2007, in the Eastern District
26 of California, defendant Lo Cha THAO told defendant Harrison JACK
27 that defendant General VANG PAO had ordered funding to be in
28 place for a purchase.

1 O. On or about April 5, 2007, in the Eastern District
2 of California, defendant Harrison JACK called defendant Lo Cha
3 THAO and asked how soon defendant General VANG PAO would want to
4 "round up any of that equipment like we were talking last time."

5 The April 12 & 13th Meetings

6 P. On or about April 12, 2007, in the Eastern District
7 of California, defendant Harrison JACK met with the undercover
8 agent at the a bar and grill in Sacramento, at which time JACK
9 discussed with the undercover agent the prices for various
10 armaments and told the undercover agent that he would be going to
11 Stockton the following day to meet with the leadership.

12 Q. On or about April 12, 2007, in the Eastern District
13 of California, defendant LO Cha THAO spoke to defendant Harrison
14 JACK, and explained that defendant General VANG PAO would give
15 the order pending the outcome of an intelligence mission inside
16 Laos to determine if an unnamed person, with the proper
17 equipment, could handle "the coup."

18 R. On or about April 12, 2007, in the Eastern District
19 of California, defendant Lo Cha THAO asked defendant Harrison
20 JACK to meet him the following day.

21 S. On or about April 13, 2007, in the Eastern District
22 of California, defendants Harrison JACK and Lo Cha THAO met for
23 approximately 25 minutes in the parking lot of the K-Mart store
24 near Highway 99 and Farmington Road in Stockton.

25 T. On or about April 13, 2007, in the Eastern District
26 of California, defendant Harrison JACK advised the undercover
27 agent that he had learned from defendant Lo Cha THAO how the
28 Hmong guerilla army in Laos is divided. He also told the

1 undercover agent that he should deliver the equipment to a
2 staging area in Thailand, and that the staging area is a
3 residence near the Laos border. JACK said that his Hmong
4 contacts still wanted to hire mercenaries from the undercover
5 agent.

6 The April 18th Meeting at the Doubletree

7 U. On or about April 18, 2007, in the Eastern District
8 of California, defendants Harrison JACK, Chong Yang THAO, Chue
9 LO, Hue VANG, and YOUA TRUE VANG met with the undercover agent in
10 a room at the Doubletree Hotel, 2001 Point West Way, Sacramento,
11 California, at which time they inspected a crate containing five
12 AK-47 machine guns.

13 V. On or about April 24, 2007, in the Eastern District
14 of California, defendants Hue VANG, Lo Cha THAO and Harrison JACK
15 discussed with the undercover agent whether he could deliver a
16 large quantity of machine guns, primarily AK-47s and M-16s with
17 M-203 grenade launchers to various staging areas in Thailand
18 along the Laos border. Defendant Lo Cha THAO explained that the
19 time line depended on the outcome of an ongoing intelligence
20 mission in Laos.

21 The April 24th Meeting at the Hilton

22 W. On or about April 24, 2007, in the Eastern District
23 of California, defendants Lo Cha THAO, Nhia Kao VANG and seven
24 associates met with the undercover agent in a hotel room at the
25 Hilton Hotel in the Natomas section of Sacramento. When in the
26 room, defendant Lo Cha THAO personally inspected five AK-47s in a
27 crate, three AT-4 anti-tank rockets, one M-14 rifle, and one
28 Stinger missile with a pistol grip and firing mechanism. Defen-

1 dant Lo Cha THAO told the undercover agent that they would need
2 the Stinger missiles in the northern province of Laos and also
3 down in the south, near Vientiane. Defendant Lo Cha THAO told
4 the undercover agent that they would purchase two missiles and
5 pistol grip firing mechanisms and two missiles for each.

6 Communications After the Hilton Meeting

7 X. On or about May 3, 2007, in the Eastern District
8 of California, defendants Harrison JACK and Lo Cha THAO met with
9 the undercover agent at a bar and grill in Sacramento, at which
10 time, defendant Lo Cha THAO told the undercover agent that he
11 (THAO) was waiting for intelligence from Thailand regarding the
12 drop locations and that they were also in the process of
13 interviewing and selecting prospective leaders who could mobilize
14 people in Laos to carry out their plans.

15 Y. On or about May 7, 2007, in the Eastern District of
16 California, defendant Harrison JACK called an associate and asked
17 if she could assist him in doing some "due diligence" on the
18 undercover agent.

19 Z. On or about May 7, 2007, in the Eastern District of
20 California, defendant Lo Cha THAO told defendant JACK to calcu-
21 late 100,000 for all the "ammos" (referring to ammunition) and
22 the AK-47s. Defendant Lo Cha THAO told defendant JACK that those
23 items will come in the second order because the first order is
24 going to be by ground. Defendant THAO told defendant JACK that
25 they will not need pyrotechnic because the order is not going to
26 be by air. Defendant Harrison JACK told defendant Lo Cha THAO
27 that the people on the ground will need smoke grenades in hand
28 prior to the second shipment in order to mark drop locations and

1 landing zones. Defendant JACK told defendant Lo Cha THAO to
2 "trust me on this one."

3 AA. On or about May 9, 2007, in the Eastern District
4 of California, defendant Harrison JACK again called his associate
5 and left a message asking her to run the undercover agent's name
6 and number through the checks she has.

7 BB. On or about May 9, 2007, in the Eastern District
8 of California, defendant Harrison JACK told the undercover agent
9 that he had spoken with defendant Lo Cha THAO, and that defendant
10 Lo Cha THAO wanted to complete the payment for the shipment in
11 Mexico, Thailand or offshore in international waters.

12 CC. On or about May 9, 2007, in the Eastern District
13 of California, defendant Harrison JACK told defendant Lo Cha THAO
14 that the agent can have the first shipment of arms and munitions
15 in Thailand on May 29, 2007.

16 The May 11th Meeting

17 DD. On or about May 11, 2007, in the Eastern District
18 of California, defendants Harrison JACK and Lo Cha THAO met with
19 the undercover agent at a bar and grill in Sacramento, at which
20 time defendant Lo Cha THAO stated that Hmong insurgents were at
21 rallying points right now. Defendant Harrison JACK also told the
22 undercover agent that he had spoken to one of their strategic
23 planners and was told that they had men in place. Defendant Lo
24 Cha THAO told the undercover agent that he wanted the agent's men
25 to do a "quick set up" in Vientiane, and said that any disaster
26 would send the Laotian government out of the country. Defendant
27 Lo Cha THAO told the undercover agent that he wanted seven or
28 eight key government buildings blown up at the same time. Defen-

1 dant Lo Cha THAO told the undercover agent that he would need
2 AK-47s, LAW rockets (Light Anti-Tank Weapons), AT-4 anti-tank
3 rockets and Claymore mines.

4 The May 21 Conversation Between Harrison Jack and Lo Cha Thao

5 EE. On or about May 21, 2007, in the Eastern District
6 of California, defendant Lo Cha THAO engaged defendant Harrison
7 JACK in a lengthy discussion, at which defendant Lo Cha THAO
8 passed along a large amount of intelligence that one of the
9 conspirators' operatives has been collecting in Vientiane. Lo
10 Cha THAO told JACK that he's got a man on the ground that is
11 walking around like a tourist with his digital camera, trying to
12 get whatever pictures he can. JACK and Lo Cha THAO discussed the
13 Laos Royal Palace, and JACK said that the next time that Lo Cha
14 THAO talks to his person on ground, Lo Cha THAO should identify
15 the gate guard changes, including how they rotate, how many
16 people rotate and where (specific locations - along a wall or if
17 there is a checkpoint or if there is an entrance area).

18 The May 23rd Meeting

19 FF. On or about May 23, 2007, in the Eastern District
20 of California, defendants Harrison JACK, Lo Cha THAO, Lo THAO,
21 and Chong Yang THAO met with the undercover agent at a bar and
22 grill in Sacramento. Defendant Lo Cha THAO pulled out a map of
23 Thailand and Laos and identified several locations near the
24 Thailand-Laos border where the undercover agent could deliver
25 weapons. Defendant Lo Cha THAO showed the agent two locations on
26 the map and said he wanted the first shipment divided and
27 delivered to those locations. Lo Cha THAO advised the undercover
28 agent that the second load of weapons and equipment would be

1 wanted 7 days after the first load. Lo Cha THAO indicated that
2 it would take three or four loads to handle their needs for arms
3 and munitions. JACK pointed out to defendant Lo Cha THAO that
4 when the government buildings came down, defendant THAO had to
5 have troops in place outside the buildings ready to take over and
6 "do what they have to do. That is how you cut the head off the
7 snake." Lo Cha THAO advised the undercover agent that defendant
8 General VANG Pao was completely on board with the plan (to
9 overthrow the government of Laos) and that defendant VANG Pao
10 agreed with the operational plan. Defendant Lo Cha THAO said
11 that defendant General VANG Pao was fully engaged in the
12 discussion and was on board. Lo Cha THAO said, "We're the
13 masterminds on this so the generals don't get into trouble."
14 Defendant Lo Cha THAO said that defendant General VANG Pao wants
15 to walk into Vientiane before he dies.

16 The Operation Plan

17 GG. In or about February 2007, defendant Dang VANG
18 prepared a document titled "OPERATION POPCORN, A Comprehensive
19 Plan of Action, Coup Operation" (the "Operation Plan"). During
20 an interview, defendant Dang VANG admitted to authoring the
21 Operation Plan. As written on the cover page of the Operation
22 Plan, "POPCORN" is an acronym for "Political Opposition Party's
23 Coup Operation to Rescue the Nation." Among other things, the
24 Operation Plan details the means and methods the defendants will
25 use to cause the overthrow of the current government of Laos and
26 creates a budget for the purchase of weapons and other
27 administrative actions.

28 All in violation of Title 18, United States Code, Sections

371 and 960.

COUNT TWO: [18 U.S.C. § 956(a) - Conspiracy to Kill, Kidnap,
Maim and Injure People in a Foreign Country]

The Grand Jury further charges: T H A T

HARRISON ULRICH JACK;
GENERAL VANG PAO,
aka Pao Vang,
aka Vang Pao;
LO CHA THAO;
LO THAO,
aka President Lo Thao,
aka Xai Lo Thao;
YOUA TRUE VANG,
aka Joseph Youa Vang,
aka Colonel Youa True Vang;
HUE VANG;
CHONG YANG THAO;
SENG VUE;
CHUE LO;
NHIA KAO VANG; and
DANG VANG,
aka David Vang,

defendants herein, as follows:

1. Paragraphs 1 though 14 and 17 through 33 of count one of
this indictment are hereby referenced and incorporated as if
realleged herein.

2. Beginning on a date unknown, but no later than on or
about November 1, 2006, and continuing until on or about June 3,
2007, in the Eastern District of California and elsewhere,
defendants herein, did conspire, combine, confederate and agree
with each other and others both known and unknown to the grand
jury, regardless of where such person or persons were located, to
commit at any place outside the United States an act that would
constitute the offense of murder, kidnapping or maiming if
committed in the special maritime and territorial jurisdiction of
the United States, and in furtherance thereof did commit an act

1 within the United States to effect an object of the conspiracy.

2 In violation of Title 18, United States Code, Section
3 956(a).

4 COUNT THREE: [18 U.S.C. § 2332g - Conspiracy to Receive and
5 Possess Missile Systems Designed to Destroy
Aircraft]

6 The Grand Jury further charges: T H A T

7 HARRISON ULRICH JACK;
8 GENERAL VANG PAO,
9 aka Pao Vang,
aka Vang Pao;
LO CHA THAO;
LO THAO,
10 aka President Lo Thao,
aka Xai Lo Thao;
11 HUE VANG;
CHONG YANG THAO;
12 YOUA TRUE VANG,
aka Joseph Youa Vang,
13 aka Colonel Youa True Vang;
NHIA KAO VANG; and
14 DANG VANG,
aka David Vang,
15

16 defendants herein, as follows:

17 1. Paragraphs 1 though 14 and 17 through 33 of count one of
18 this indictment are hereby referenced and incorporated as if
19 realleged herein.

20 2. Beginning on a date unknown, but no later than on or
21 about November 1, 2006, and continuing until on or about June 3,
22 2007, in the Eastern District of California and elsewhere,
23 defendants did conspire, combine, confederate and agree with each
24 other and others both known and unknown to the grand jury, to
25 knowingly acquire, transfer directly or indirectly, receive,
26 possess, export or use, and attempt to possess and use an
27 explosive or incendiary rocket or missile that is guided by any
28 system designed to enable the rocket or missile to seek or

1 proceed towards energy radiated or reflected from an aircraft or
2 toward an image locating an aircraft, and otherwise direct or did
3 guide the rocket or device towards an aircraft, and a device
4 designed or intended to launch or guide such a rocket or missile,

5 In violation of Title 18, United States Code, Section 2332g.

6 COUNT FOUR: [18 U.S.C. § 371- Conspiracy to Receive and Possess
7 Firearms and Destructive Devices, 18 U.S.C.
8 § 922(o), 26 U.S.C. § 5861]

9 The Grand Jury further charges: T H A T

10 HARRISON ULRICH JACK;
11 GENERAL VANG PAO,
12 aka Pao Vang,
13 aka Vang Pao;
14 LO CHA THAO;
15 LO THAO,
16 aka President Lo Thao,
17 aka Xai Lo Thao;
18 YOUA TRUE VANG,
19 aka Joseph Youa Vang,
20 aka Colonel Youa True Vang;
21 HUE VANG;
22 CHONG YANG THAO;
23 SENG VUE;
24 CHUE LO;
25 NHIA KAO VANG; and
26 DANG VANG,
27 aka David Vang,
28

defendants herein, as follows:

20 1. Paragraphs 1 though 14 and 17 through 33 of count one of
21 this indictment are hereby referenced and incorporated as if
22 realleged herein.

23 2. Beginning on a date unknown, but no later than on or
24 about November 1, 2006, and continuing until on or about June 3,
25 2007, in the Eastern District of California and elsewhere,
26 defendants did conspire, combine, confederate and agree with each
27 other and others both known and unknown to the grand jury, to
28 commit offenses against the United States as follows:

1 (a) to knowingly transfer and possess one or more machine
2 guns, in violation of Title 18, United States Code, Section
3 922(o); and

4 (b) to knowingly receive and possess a firearm that is not
5 registered to him in the National Firearms Registration and
6 Transfer Record, in violation of Title 26, United States Code,
7 Section 5861.

8 All in violation of Title 18, United States Code, Sections
9 371 and 922(o) and Title 26, United States Code, Section 5861.

10 COUNT FIVE: [18 U.S.C. § 371 - Conspiracy to Export Listed
11 Defense Items Without a State Department License,
22 U.S.C. § 2778]

12 The Grand Jury further charges: T H A T

13 HARRISON ULRICH JACK;
14 GENERAL VANG PAO,
15 aka Pao Vang,
16 aka Vang Pao;
17 LO CHA THAO;
18 LO THAO,
19 aka President Lo Thao,
20 aka Xai Lo Thao;
21 YOUA TRUE VANG,
22 aka Joseph Youa Vang,
23 aka Colonel Youa True Vang;
24 HUE VANG;
25 CHONG YANG THAO;
26 SENG VUE;
27 CHUE LO;
28 NHIA KAO VANG; and
DANG VANG,
aka David Vang,

defendants herein, as follows:

1. Paragraphs one through 14 and 17 through 33 of count one
of this indictment are hereby incorporated as if fully set forth
herein.

2. Between on or about November 1, 2006 and continuing to o
or about May 29, 2007, in the State and Eastern District of

1 California, and elsewhere, defendants did knowingly and willfully
2 conspire with each other and with persons both known and unknown
3 to the grand jury to export from the United States to Laos, via
4 Thailand, a quantity of defense articles, that is AK-47 automatic
5 rifles; M-16A1 and M-16A2 automatic rifles, M-14 automatic
6 rifles, Stinger missiles, LAWS rockets, AT-4 handheld anti-tank
7 rockets, Claymore mines, rocket-propelled grenades, and C-4
8 explosives, which are designated as defense articles on the
9 United States Munitions List, without first having obtained from
10 the Department of State a license for such exports or written
11 authorization for such exports, in violation of Title 18, United
12 States Code, Section 371, and Title 22, United States Code,
13 Sections 2778(b)(2) and 2778(c), and Title 22, Code of Federal
14 Regulations, Sections 121.1, 121.4, 123.1, 127.1(c) and 127.3.

15 All in violation of Title 18, United States Code, Section
16 371 and Title 22, United States Code, Section 2778.

17 A TRUE BILL.

18 **/s/ Signature on file w/AUSA**

19 FOREPERSON

20 
21 MCGREGOR W. SCOTT
22 United States Attorney
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